

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

| | | |
|---|---|----------------------------|
| Crystal Long, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 8:17-cv-01955-GJH |
| |) | |
| Ability Recovery Services, LLC, et al., |) | |
| |) | |
| Defendants. |) | |

Declaration in Support of Motion for Summary Judgment

I, Morgan I. Marcus, hereby declare as follows:

1. I am an attorney granted leave to appear in this matter *pro hac vice*.
2. I am an attorney at the law firm of Sessions, Fishman, Nathan, and Israel, LLC, attorneys of record for Defendant Pendrick Capital Partners II, LLC (“Pendrick”).
3. I have personal knowledge of the matters set forth in this declaration. If called as a witness, I could testify competently to such matters.
4. Attached as Exhibit A to this Declaration is a true and correct copy of the Declaration of Anthony Albanese, Chief Compliance Officer for Pendrick, along with supporting exhibits.
5. Attached as Exhibit B to this Declaration is a true and correct copy of Crystal Long’s discovery responses dated November 29, 2017.
6. Attached as Exhibit C to this Declaration is a true and correct copy of Pendrick’s discovery responses dated February 16, 2018.
7. Attached as Exhibit D to this Declaration is a true and correct copy of the deposition of Crystal Long dated February 19, 2018.
8. Attached as Exhibit E to this Declaration is a true and correct copy of the deposition of Kim Nanfeldt, corporate representative for Ability Recovery Services, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of April, 2018, at Chicago, Illinois.

/s/Morgan I. Marcus

Morgan I. Marcus, Esq.

Sessions Fishman Nathan & Israel, LLC

120 South LaSalle Street, Suite 1960

Chicago, IL 60603-3561

Telephone: (312) 578-0990

Facsimile: (312) 578-0991

Email: mmarcus@sessions.legal

Counsel for Pendrick Capital Partners II, LLC

Admitted Pro Hac Vice